



THE CITY OF NEW YORK
LAW DEPARTMENT

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June 13, 2022

Via CM/ECF

Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: *Muniz v. City of New York*, et al.
Civil Action No. 1:20-CV-09223-JPC
Law Department No. 2020-046956

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing Defendants, the City of New York and New York City Police Department Inspector John Mastronardi (collectively, “Defendants”), in the above-referenced case. I write on behalf of the parties to respectfully request that the time to file a joint status letter with the Court be extended by seven days, from June 15, 2022, to June 22, 2022. This is the fourth joint request by the parties to extend this deadline. The requested extension would not affect any other deadlines in this litigation.

Inspector Mastronardi was deposed by Plaintiff Johnny Muniz (“Plaintiff”) on June 7, 2022. Defendants intend to file a motion for summary judgment, and the joint status letter will include both Defendants’ anticipated grounds for the motion and Plaintiff’s anticipated grounds for opposing it. The one-week extension of time is sought so that the parties may have sufficient time to succinctly lay out for the Court their respective arguments on the anticipated motion.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Zachary T. Ellis

Assistant Corporation Counsel


cc: All Counsel of Record via CM/ECF

The Court grant this request. The parties shall file a joint status letter by June 22, 2022. The Clerk of the Court is respectfully directed to close the motion pending at Docket Number 45.

SO ORDERED.

Date: June 14, 2022

New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN

United States District Judge